

EXHIBIT “F”

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

EVELYN CINTRON	:	
Plaintiff,	:	
	:	
v.	:	
	:	Civil Action No. 19-4078-RBS
CITY OF PHILADELPHIA, et al.	:	
Defendants.	:	
	:	
	:	
	:	

**DEFENDANT JOSEPH SULLIVAN’S ANSWERS AND OBJECTIONS TO
PLAINTIFF’S INTERROGATORIES**

Defendant, the City of Philadelphia, by and through undersigned counsel, and pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, responds and objects to Plaintiff’s, Evelyn Cintron (“Plaintiff” or "Ms. Cintron") Interrogatories as follows:

PRELIMINARY STATEMENT

1. Defendant's investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are not a waiver of, Defendant's right to rely on other facts or documents at trial.

2. By making the accompanying responses and objections to Plaintiff’s interrogatory, Defendant does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, Defendant makes the responses and objections herein without in any way implying that it considers the requests and interrogatory, and responses to the requests and interrogatory, to be relevant or material to the subject matter of this action.

10. State whether you had the authority to direct PAL how to distribute charitable gifts, donations and monies given to PAL.

Answer: No.

11. State whether plaintiff ever orally or in writing inform you that there was a disparity in funding between PAL centers that serviced minority communities and those that serviced white communities.

Answer: No.

12. If your answer to the preceding interrogatory is in the affirmative, state when plaintiff informed you and state your response.

Answer: N/A.

13. State whether plaintiff ever orally or in writing informed you that within the police unit assigned to PAL she observed different treatment administered toward minority officers than their white fellow officers.

Answer: No.

14. If your answer to the preceding interrogatory is in the affirmative, state when plaintiff informed you and state your response.

Answer: N/A.

15. State whether you ever did a performance evaluation of the plaintiff.

Answer: No.

16. If your answer to the preceding interrogatory is in the affirmative, state when the evaluation was performed, and the rating plaintiff received.

Answer: N/A.

17. State whether there have been any claims of retaliation for complaining about discrimination been made against you during your career with the Philadelphia Police Department.

Answer: No.

18. If your answer to the preceding interrogatory is in the affirmative, state when the claim(s) were made and if any of them was substantiated.

Answer: N/A.

19. State whether you had the authority to order plaintiff from attending PAL board of director's meetings.

Answer: Yes. Answering Defendant had the authority to order Plaintiff to attend meetings and attending meetings was considered part of her responsibilities.

20. State whether PAL had the authority to exclude plaintiff from attending PAL board of director's meetings.

Answer: Answering Defendant does not know. If Answering Defendant had been notified that the Commanding Officer of the PAL had been excluded, it would have been addressed with the PAL Director.

21. State whether there is an agreement between the City of Philadelphia and PAL expressing the terms and conditions of their relationship.

Answer: Answering Defendant does not know.

22. State whether you had use of an office located at 3068 Belgrade Avenue, Philadelphia, Pennsylvania, the PAL headquarters.

Answer: No.

23. State the number of PAL board of director's meetings you attended during your assignment to the PAL unit.